

NOTICE OF PRELIMINARY FINDINGS

FIRM NAME: BCP INGREDIENTS INCORPORATED RMP/TRI NO: FRS#100000071281

FIRM ADDRESS: 299 EXTENSION ST
VERONA, MO 65769

INSPECTOR: LORENZO SENA DATE: 6/9/2022

An inspection of the above facility has just been completed. The purpose of the inspection was to determine compliance with the requirements of the Clean Air Act Section 112r and Emergency Planning Community Right-to-Know Act. The following potential violations were identified:

CITATION	DESCRIPTION
1 40 CFR 68.93(a)	FACILITY DID NOT CONDUCT ANNUAL COORDINATION
2 40 CFR 68.93(c)	FACILITY DID NOT DOCUMENT PAST COORDINATION ACTIVITIES
3 40 CFR 68.20-39	FACILITY HAZARD ASSESSMENT DID NOT MEET ALL REQUIREMENTS LISTED IN 40 CFR 68 SUBPART B
4 40 CFR 68.79(d)	FACILITY DID NOT DOCUMENT OR DETERMINE APPROPRIATE RESPONSE OR DOCUMENT THAT DEFICIENCIES WERE CORRECTED
5 40 CFR 68.79(e)	FACILITY DID NOT HAVE 2017 COMPLIANCE AUDIT
6 40 CFR 68.190(b)(1)	FACILITY SUBMITTED RMP FEB 25, 2021 RMP DUE DATE JAN 25, 2020
7 40 CFR 68.175(e)	FACILITY DID NOT IDENTIFY THE CORRECT PHA TECHNIQUE
8 40 CFR 68.69(a)	FACILITY SOPs DO NOT ADDRESS ALL OF THE REQUIRED ELEMENTS

This Notice is provided to call your attention to those areas of potential noncompliance at the earliest possible time. This Notice does not constitute a Notice of Violation, Order, or Civil Action pursuant to the Emergency Planning Community Right-to-Know Act of 1986 (SARA Title III) or Section 113 of the Clean Air Act (CAA), and may not be a complete listing of all violations which may be identified as a result of this inspection.

You are encouraged to take corrective action to address these preliminary findings. **Please submit** the actions you take and/or a schedule of the actions to EPA in writing as soon as possible.

LORENZO SENA

Phone: (913) 551-5094
sena.lorenzo@epa.gov

U.S. Environmental Protection Agency
11201 Renner Blvd.
Lenexa, Kansas 66219

Corrective actions you have taken may be considered in any subsequent U.S. EPA enforcement follow-up, to the extent allowed by Agency regulations, guidance, and policies.

The undersigned hereby acknowledges receipt of a copy of this Notice.

PRINTED NAME: Gregory V. Henthorn
TITLE: Plant Manager
SIGNATURE: Gregory V. Henthorn DATE: 6/9/22

The EPA Region VII Pollution Prevention Team can help you identify pollution prevention and waste reduction opportunities. For more information, email: rivas.marcus@epa.gov

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CITATION	DESCRIPTION
9 40CFR 68.65(c)(1)(iv)	FACILITY DID NOT EVALUATE CONSEQUENCES OF DEVIATION ON PSI
10 40CFR 68.79(a)	FACILITY DID NOT CERTIFY COMPLIANCE AUDITS
11 40CFR 68.65(d)(1)(viii)	FACILITY PSI DID NOT INCLUDE SAFETY SYSTEMS

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